



Andy Park

06/16/00 02:00 PM

To: Deborah Goldblum/R3/USEPA/US@EPA, ffaranca@dep.state.nj.us

cc: Henry Schuver/DC/USEPA/US@EPA, Barry
Tornick/R2/USEPA/US@EPA

Subject: DuPont GW-SW Issues

Based on numerous e-mails among us, it could be safely said that DuPont's proposal currently under review of Region 3 is different from the one under review of Region 2, concerning the surface water-groundwater interface as related to the CA750 Environmental Indicator. The main difference is that the Region 3 approach focuses on sediments to determine potential eco impacts as opposed to the Region 2 approach focusing on the surface water quality.

It is not wrong for me to say at this time that, based on EPA's experience and expertise so far concerning this issue, we do not know, for that matter maybe nobody knows, which approach is better protective of human health and the environment. We cannot say at this time that reviewing and assessing sediments to determine eco impacts would necessarily result in better protectiveness. Furthermore, (correct me if I am wrong) the subject of eco impacts/risks is not as much advanced as human health risks. The current scientific understanding of ecological risks may not allow us to perform adequate eco risk assessments (meaning that performing eco-risks at this time may not provide any substantially additional values). Furthermore, we are under the tight timetable to achieve the GPRA goals and we may not afford to wait for the acceptable advancement of scientific understanding on the ecological risks. Under the circumstances, as much as Region 3 may feel strongly about the approach under their review, NJDEP feels the same way about the approach under their review. Although Region 2 has not yet completely concurred on the proposal, we have to say that the approach appears technically sound and has some merits that must not be lost out but rather be further considered.

Therefore, I believe that it is not too much to ask if I suggest that everybody get together and come up with an approach that is acceptable to all stakeholders. If you agree, please let me know. As a start, I will set up either a meeting or a conference call.

Andy Park
212-637-4184
Park.Andy@epamail.epa.gov